

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Grain)	
Belt Express LLC for an Amendment to its)	
Certificate of Convenience and Necessity)	
Authorizing it to Construct, Own, Operate,)	
Control, Manage, and Maintain a High Voltage,)	EA-2023-0017
Direct Current Transmission Line and)	
Associated Converter Station)	

MOTION TO INTERVENE BY THE
MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION d/b/a
MISSOURI ELECTRIC COMMISSION

The Missouri Joint Municipal Electric Utility Commission d/b/a Missouri Electric Commission (“MEC”), pursuant to 20 CSR 4240-2.075, respectfully moves to intervene in the above-referenced case. In support thereof, MEC states as follows:

1. On August 24, 2022, Grain Belt Express, LLC (“Grain Belt Express”) filed an application to amend its existing Certificate of Convenience and Necessity (“CCN”) to construct, install, own, operate, maintain, and otherwise control and manage an approximately 880-mile, overhead, multi-terminal ±600 kilovolt high-voltage, direct current transmission line and associated facilities including converter stations and alternating current connector lines (“the Project”).
2. On September 1, 2022, the Missouri Public Service Commission (“Commission”) issued its Order Directing Notice, Setting Intervention Deadline, Setting Time for Responses, and Directing Filing which set an intervention deadline of September 30, 2022.
3. MEC is a joint action agency and a body corporate and politic of the State of Missouri and, as such, is not subject to the jurisdiction of the Commission. MEC is authorized

by §§393.700 to 393.770 *Revised Statutes of Missouri* to construct, operate and maintain jointly owned transmission and generation facilities for the production and transmission of electric power for its members, to purchase and sell electric power and energy, and to enter into agreements with any person for the transmission of electric power. MEC is organized on a state-wide basis to promote efficient wheeling, pooling, generation, and transmission arrangements to meet the power and energy requirements of the municipal electric utilities in the State of Missouri.

MEC's membership includes seventy municipal entities in Missouri and four advisory members in Arkansas. Together, MEC's members serve over 500,000 retail electric customers.

4. MEC is located at 2200 Maguire Boulevard, Columbia, Missouri 65201.

Correspondence, communications, orders and the decision in this matter should be addressed to:

Peggy A. Whipple
Douglas L. Healy
Healy Law Offices, LLC
3010 East Battlefield, Suite A
Springfield, Missouri 65804
peggy@healylawoffices.com
doug@healylawoffices.com
Telephone: 417-864-7018

5. MEC has an interest that is different from that of the general public, in that it represents the interest of municipal electrical systems throughout the state, as well having entered into a transmission service agreement to utilize the Project to deliver power to MEC's members that this Commission found in EA-2016-0358 to be needed and in the public interest. Such interest is not currently represented in this case.

6. MEC supports Grain Belt Express's application to amend its existing CCN and requests the Commission approve such application.
7. Granting intervention to MEC would serve the public interest by allowing MEC's benefit, experience and insight to be part of this case.

WHEREFORE, MEC prays that this Commission issue an order granting its motion to intervene in this case and for such other orders and relief as may be appropriate in the circumstances.

Respectfully Submitted,

By: /s/ Peggy A. Whipple
Peggy A. Whipple MO Bar # 54758
Douglas L. Healy MO Bar # 51630
Healy Law Offices, LLC
3010 E. Battlefield, Ste. A
Springfield, Missouri 65804
Telephone: (417) 864-7018
Facsimile: (417) 864-7018
Email: peggy@healylawoffices.com
doug@healylawoffices.com

***Attorneys for Missouri Joint Municipal
Electric Utility Commission d/b/a Missouri
Electric Commission***

CERTIFICATE OF SERVICE

I hereby certify that on this 23th of September, 2022 a copy of the foregoing **Motion to Intervene by the Missouri Joint Municipal Electric Utility Commission d/b/a Missouri Electric Commission** has been served on all parties on the official service lists for this matter via filing in the Commission's EFIS system and/or email.

/s/ Peggy A. Whipple
Peggy A. Whipple